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U.S. VENTURE PARTNERS XII, L.P.,  
U.S. VENTURE PARTNERS XII-A, L.P.,  
and THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY

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RUNWAY, LTD., and SHLOMO TOUBOUL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

U.S. VENTURE PARTNERS XII, L.P., U.S.  
VENTURE PARTNERS XII-A, L.P. and THE  
BOARD OF TRUSTEES OF THE LELAND  
STANFORD JUNIOR UNIVERSITY,

Plaintiffs,

vs.

RUNWAY, LTD., an Israeli company and  
SHLOMO TOUBOUL, an Israeli citizen,

Defendants.

CASE NO. 25-cv-00639-WHO

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER OF DISMISSAL**

1 Plaintiffs, U.S. Venture Partners XII, L.P., U.S. Venture Partners XII-A, L.P. and The Board  
2 of Trustees of the Leland Stanford Junior University (collectively “U.S. Venture Partners”), and  
3 Defendants, Runway, Ltd. and Shlomo Touboul (collectively “Defendants”), by and through their  
4 undersigned counsel, advise the Court that this action has been settled and hereby stipulate under  
5 Federal Rule of Civil Procedure 41(a)(2) to a dismissal with prejudice, of all claims, counterclaims  
6 and defenses filed or otherwise asserted in this action. Each party shall bear his or its own costs and  
7 attorneys’ fees in connection with this action.

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10 Dated: June 12, 2025

**CARR & FERRELL LLP**

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13 By

  
ROBERT J. YORIO

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15 Attorneys for Plaintiffs  
16 U.S. VENTURE PARTNERS XII, L.P.,  
17 U.S. VENTURE PARTNERS XII-A, L.P. and  
18 THE BOARD OF TRUSTEES OF THE LELAND  
STANFORD JUNIOR UNIVERSITY

19 Dated: June 12, 2025

**NESS PLLC**


20  
21 By /s/ Eliyahu Ness

22 ELIYAHU NESS

23 Attorney for Defendants  
24 RUNWAY, LTD. and SHLOMO TOUBOUL  
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**SIGNATURE ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), the undersigned filer of this document attests that concurrence in the filing of this document has been obtained from each of the other signatories.


By   
Robert J. Yorio

**~~[PROPOSED]~~ ORDER**

The JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER OF DISMISSAL is approved, and this action is dismissed with prejudice with each party to bear his or its attorney's fees and costs.

**IT IS SO ORDERED.**

Dated: June 13, 2025

  
HONORABLE WILLIAM H. ORRICK  
UNITED STATES DISTRICT COURT JUDGE